PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Prodesign Paint, Plant 820
910 Summa Drive
Elkhart, Indiana 46516

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-7510-00320	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary van and recreational vehicle parts custom painting source.

Responsible Official:	Kevin Gipson
Source Address:	910 Summa Drive, Elkhart, Indiana 46516
Mailing Address:	23925 Reedy Drive, Elkhart, Indiana 46514
Phone Number:	(219) 262-9250
SIC Code:	3711
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) The following surface coating facilities with an average maximum capacity of 2.5 kits of metal and/or plastic vehicle parts per booth, per hour:

(1) Three (3) paint booths, identified as Paint Booths 1 through 3, for coating fiberglass, plastic, and metal van and recreational vehicle parts, constructed in 1983, with all booths equipped with high volume, low pressure (HVLP) and air assisted airless spray guns, with dry filters as overspray control and exhausting to stacks V1 through V6.

(2) One (1) parts repair spray booth, identified as Repair Booth No. 4, constructed in 1998, with overspray emissions controlled by an exhaust filter system, with all emissions exhausted to Stack V8.

(b) Two (2) parts sanding booths, identified as Sanding Booths Nos. 5 and 6, constructed in 1998, for sanding and surface cleaning parts, with particulate emissions controlled by dry filters, and exhausting to Stacks V9 and V10, respectively, capacity: 75 parts per hour, each, and 0.72 tons per hour, each.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this

permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) & (13)] [326 IAC 2-7-6(1) & (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMP's shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that

other specifically identified requirements are not applicable.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superceded by this permit.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation, except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(A) A brief description of the change within the source;

(B) The date on which the change will occur;

(C) Any change in emissions; and

(D) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

B.22 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-7-10.5.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM, within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM, when applicable. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.

(1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.

(2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.

(c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) The following surface coating facilities with an average maximum capacity of 2.5 kits of metal and/or plastic vehicle parts per booth, per hour:

(1) Three (3) paint booths, identified as Paint Booths 1 through 3, for coating fiberglass, plastic, and metal van and recreational vehicle parts, constructed in 1983, with all booths equipped with high volume, low pressure (HVLP) and air assisted airless spray guns, with dry filters as overspray control and exhausting to stacks V1 through V6.

(2) One (1) parts repair spray booth, identified as Repair Booth No. 4, constructed in 1998, with overspray emissions controlled by an exhaust filter system, with all emissions exhausted to Stack V8.

(b) Two (2) parts sanding booths, identified as Sanding Booths Nos. 5 and 6, constructed in 1998, for sanding and surface cleaning parts, with particulate emissions controlled by dry filters, and exhausting to Stacks V9 and V10, respectively, capacity: 75 parts per hour, each, and 0.72 tons per hour, each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) The VOC delivered to the applicators, minus the VOC recovered when coating metal parts shall be limited to less than 15 pounds per day. This will limit VOC emissions from coating metal parts to less than 15 pounds per day and make the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating, not applicable pursuant to 326 IAC 8-2-1(c), 326 IAC 8-2-1(d).

(b) The condition in Registration for Plant 2 (no number) issued January 4, 1985 stating that no construction or operation permit is required, there are no limits in 325 IAC 6-3 or 8-2 that are applicable to this operation, and this registration is issued with the condition that operation of the spray paint booths shall be limited to 4,500 hours per year in order to limit volatile organic compound (VOC) emissions to less than 25 tons per year, is not applicable because this source is located in Elkhart County and the three (3) paint rooms covered in this permit were in existence as of July 1, 1990. Therefore, a limitation of less than 25 tons per year will not make the requirements of 326 IAC 8-2 not applicable.

D.1.2 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New facilities; General reduction requirements), the Best Available Control Technology (BACT) shall be used for the three (3) paint booths, one (1) parts repair spray booth and two (2) parts sanding booths. BACT for these facilities has been determined to be the following:

(a) All coatings will be applied using high volume, low pressure (HVLP) spray equipment or a spray applicator as efficient or more efficient than a HVLP spray applicator.

(b) The total VOC usage in coatings and cleanup solvents used at the surface coating facilities, minus the VOC recovered, shall be limited to no more than 95 tons per consecutive twelve (12) month period.

(c) The listed work practices as follows:

(1) Cleanup solvent containers used to transport solvent from bulk containers to work stations shall be closed containers having soft gasketed spring-loaded closures.

(2) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(3) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(4) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized.

(5) Storage containers used to store VOC and/or HAP containing materials shall be kept covered when not in use.

(6) The application equipment operators shall be instructed and trained in the methods and practices utilized to minimize overspray.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The PM from the three (3) paint booths, constructed in 1983, and the particulate matter (PM) from the one (1) parts repair spray booth, identified as Repair Booth No. 4, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the two (2) sanding booths shall not exceed 3.3 pounds per hour, each, when operating at a process weight rate of 0.72 tons per hour, each.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(c) Operation Condition 10(a) from CP-039-10054-00320, issued January 21, 1999, which

states that pursuant to 326 IAC 6-3 (Process Operations), the cloth filters for SANDBOOTH #1 and SANDBOOTH #2 (now identified as Sanding Booths Nos. 5 and 6) shall be in operation at all times when the booths are in operation, and shall not exceed the combined allowable particulate matter (PM) emission rate of 3.3 pounds per hour, is not applicable because the allowable PM emission rate of 3.3 pounds per hour should be per facility when operating at a process weight rate of 0.72 tons per hour, each. The source has determined that each booth may operate at a process weight rate of 0.72 tons per hour.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and all control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC Emissions

(a) Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage on metal parts for each day during the most recent month.

(b) Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.7 Particulate Matter (PM)

(a) The dry filters for PM control shall be in operation at all times when the three (3) paint booths and one (1) parts repair spray booth are operation.

(b) The dry filters shall be in operation at all times when the two (2) sanding booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks V1 through V6 and V8 while one or more of the facilities are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a

violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and monthly, as indicated, and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used each month. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC used (VOC delivered to the applicators minus VOC recovered) on metal parts each day;

(5) The total VOC usage (VOC delivered to the applicators minus VOC recovered) for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(d) Operation Condition 12 from CP-039-10054-00320, issued January 21, 1999, which states that records of surface coating quantities and organic solvent contents from REPBOOTH (now identified as Repair Booth No. 4), SANDBOOTH #1 and SANDBOOTH #2 (now identified as Sanding Booths Nos. 5 and 6) shall be maintained, records of surface coating quantities and organic solvent contents from REPBOOTH shall be maintained demonstrating that the total daily VOC emissions from the coating of metal parts in spray booth REPBOOTH do not exceed 15 pounds per day, and any change or modification which may increase the actual VOC emissions from the coating of metal parts in spray booth REPBOOTH to greater than fifteen (15) pounds per day, increase the potential VOC emissions from the coating of plastic parts in spray booth REPBOOTH to greater than 25 tons per year, or increase the potential VOC emissions from either sanding booth SANDBOOTH #1 or sanding booth SANDBOOTH #2 to greater than twenty-five tons per year, must be approved by the Office of Air Management (OAM) before such change may occur, is not applicable because the source requested that all material usage rates be included in a single BACT limitation and a limitation to make 326 IAC 8-2-9 not applicable. Therefore, VOC usage rates from each individual facility are not required, and the source

is subject to the requirements of 326 IAC 8-1-6.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Prodesign Paint, Plant 820
Source Address: 910 Summa Drive, Elkhart, Indiana 46516
Mailing Address: 23925 Reedy Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T 039-7510-00320

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Prodesign Paint, Plant 820
Source Address: 910 Summa Drive, Elkhart, Indiana 46516
Mailing Address: 23925 Reedy Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T 039-7510-00320

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Monthly Report, submitted quarterly

Source Name: Prodesign Paint, Plant 820
Source Address: 910 Summa Drive, Elkhart, Indiana 46516
Mailing Address: 23925 Reedy Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T 039-7510-00320
Facility: Surface coating
Parameter: VOC usage, when coating metal parts
Limit: Less than 15 pounds per day when coating metal parts

Months: _____ Year: _____

Day				Day			
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Prodesign Paint, Plant 820
Source Address: 910 Summa Drive, Elkhart, Indiana 46516
Mailing Address: 23925 Reedy Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T 039-7510-00320
Facilities: Three (3) paint booths (Paint Booths Nos. 1 through 3), one (1) parts repair spray booth (Repair Booth No. 4), and two (2) parts sanding booths (Sanding Booths Nos. 5 and 6) (VOC from sanding results from wiping and glazecoating plastic parts)
Parameter: VOC usage
Limit: 95 tons per consecutive twelve (12) month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Prodesign Paint, Plant 820
Source Address: 910 Summa Drive, Elkhart, Indiana 46516
Mailing Address: 23925 Reedy Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T 039-7510-00320

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/ Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	**Prodesign Paint, Plant 820**
Source Location:	**910 Summa Drive, Elkhart, Indiana 46516**
County:	**Elkhart**
SIC Code:	**3711**
Operation Permit No.:	**T 039-7510-00320**
Permit Reviewer:	**CarrieAnn Ortolani**

On May 11, 2000, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Prodesign Paint, Plant 820 had applied for a Part 70 Operating Permit to operate a van and motor home parts custom painting source with dry filters as control. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On June 14, 2000, Kevin Gipson of Prodesign, submitted comments on the proposed Part 70 Operating Permit. The comments are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.)**:

Comment 1:

Condition A.1 General Information - Please change the mailing address to 23925 Reedy Drive, Elkhart, Indiana 46514. Please change the phone number to 219 - 262 - 9250. Please make this change on all applicable reporting forms.

Response 1:

In response to this comment and Comment 2, Section A.1 has been revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary van and ~~motor home~~ **recreational vehicle** parts custom painting source.

Responsible Official:	Kevin Gipson
Source Address:	910 Summa Drive, Elkhart, Indiana 46516
Mailing Address:	~~423 North Main Street, P.O. Box 30, Middlebury, Indiana 46540~~ **23925 Reedy Drive, Elkhart, Indiana 46514**
Phone Number:	~~(219) 295-6565~~ **(219) 262-9250**
SIC Code:	3711
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

The mailing address in all reporting forms has been revised as follows:

Mailing Address: ~~423 North Main Street, P.O. Box 30, Middlebury, Indiana 46540~~
23925 Reedy Drive, Elkhart, Indiana 46514

Comments 2 and 3:

Condition A.2(a) Emissions Units and Pollution Control Equipment Summary - To accurately depict the process units at this source please change the unenforceable description information contained in this condition to "The following surface coating facilities with an average maximum capacity of 2.5 kits of metal and/or plastic vehicle parts per booth, per hour".

(1) Three Paint Booths Nos. 1-3 for coating fiberglass, plastic, and metal van and recreational vehicle parts, constructed in 1983, with all booths equipped with high volume, low pressure (HVLP) and air assisted airless spray guns, with dry filters as overspray control and exhausting to stacks V1 through V6.

(2) One parts repair spray booth identified as Repair Booth No. 4 constructed in 1998, with overspray emissions controlled by an exhaust filter system, with all emissions exhausted to Stack V8.

This change in descriptive information is for clarification purposes only and will not effect this source's permitted Emissions limit.

Condition A.2(b) Emissions Units and Pollution Control Equipment Summary - In order to accurately depict this source, please change the unenforceable descriptive information contained in this condition to "Two (2) parts sanding booths, identified as Sanding Booths Nos. 5 and 6, constructed in 1998, for sanding and surface cleaning parts, with particulate emissions controlled by dry filters, and exhausting to Stacks V9 and V10, respectively, average maximum capacity: 75 parts per hour, each, and 0.72 tons per hour, each."

Responses 2 and 3:

Since the requested changes will not affect the calculated potential to emit of the facilities and there is a limit on VOC usage, Section A.2 and the Facility Description Box in D.1 have been changed as follows:

(a) The following surface coating facilities with a**n** ~~total~~ **average maximum** capacity of 2.5 kits of metal and/or plastic vehicle parts per **booth, per** hour:

(1) Three (3) paint ~~and paint repair rooms~~ **booths, identified as Paint Booths 1 through 3,** for coating fiberglass, plastic, and metal van and ~~motor home~~ **recreational vehicle** parts, constructed in 1983, with all ~~rooms~~ **booths** equipped with high volume, low pressure (HVLP) and air assisted airless spray guns, with dry filters as overspray control and exhausting to stacks V1 through V6.

(2) One (1) parts repair spray booth, identified as **Repair Booth No. 4** ~~REPBOOTH~~, constructed in 1998, with overspray emissions controlled by an exhaust filter system, with all emissions exhausted to Stack V8.

(b) Two (2) parts sanding booths, identified as ~~SANDBOOTH #1 and SANDBOOTH #2~~ **Sanding Booths Nos. 5 and 6**, constructed in 1998, for sanding and surface cleaning parts, with particulate emissions controlled by ~~cloth~~ **dry** filters, and exhausting to Stacks V9 and V10, respectively, capacity: 75 parts per hour, each, and 0.72 tons per hour, each.

As a result of these changes, Conditions D.1.2, D.1.3 and D.1.7 have been clarified as follows:

D.1.2 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New facilities; General reduction requirements), the Best Available Control Technology (BACT) shall be used for the three (3) paint ~~and paint repair rooms~~ **booths**, one (1) parts repair spray booth and two (2) parts sanding booths. BACT for these facilities has been determined to be the following:

(a) All coatings will be applied using high volume, low pressure (HVLP) spray equipment or a spray applicator as efficient or more efficient than a HVLP spray applicator.

(b) The total VOC usage in coatings and cleanup solvents used at the surface coating facilities shall be limited to no more than 95 tons per consecutive twelve (12) month period.

(c) The listed work practices as follows:

(1) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(2) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(3) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(4) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized.

(5) Storage containers used to store VOC and/or HAP containing materials shall be kept covered when not in use.

(6) The application equipment operators shall be instructed and trained in the methods and practices utilized to minimize overspray.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The PM from the three (3) paint ~~and paint repair rooms~~ **booths**, constructed in 1983, and the particulate matter (PM) from the one (1) parts repair spray booth, identified as ~~REPBOOTH~~ **Repair Booth No. 4**, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0 P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the two (2) sanding booths shall not exceed 3.3 pounds per hour, each, when operating at a process weight rate of 0.72 tons per hour, each.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(c) Operation Condition 10(a) from CP-039-10054-00320, issued January 21, 1999, which states that pursuant to 326 IAC 6-3 (Process Operations), the cloth filters for SANDBOOTH #1 and SANDBOOTH #2 **(now identified as Sanding Booths Nos. 5 and 6)** shall be in operation at all times when the booths are in operation, and shall not exceed the combined allowable particulate matter (PM) emission rate of 3.3 pounds per hour, is not applicable because the allowable PM emission rate of 3.3 pounds per hour should be per facility when operating at a process weight rate of 0.72 tons per hour, each. The source has determined that each booth may operate at a process weight rate of 0.72 tons per hour.

D.1.7 Particulate Matter (PM)

(a) The dry filters for PM control shall be in operation at all times when the three (3) paint ~~and paint repair rooms~~ **booths** and one (1) parts repair spray booth are operation.

(b) The ~~cloth~~ **dry** filters shall be in operation at all times when the two (2) sanding booths are in operation.

Condition D.1.9 (d) has been clarified as follows:

(d) Operation Condition 12 from CP-039-10054-00320, issued January 21, 1999, which states that records of surface coating quantities and organic solvent contents from REPBOOTH **(now identified as Repair Booth No. 4)**, SANDBOOTH #1 and SANDBOOTH #2 **(now identified as Sanding Booths Nos. 5 and 6)** shall be maintained, records of surface coating quantities and organic solvent contents from REPBOOTH shall be maintained demonstrating that the total daily VOC emissions from the coating of metal parts in spray booth REPBOOTH do not exceed 15 pounds per day, and any change or modification which may increase the actual VOC emissions from the coating of metal parts in spray booth REPBOOTH to greater than fifteen (15) pounds per day, increase the potential VOC

emissions from the coating of plastic parts in spray booth REPBOOTH to greater than 25 tons per year, or increase the potential VOC emissions from either sanding booth SANDBOOTH #1 or sanding booth SANDBOOTH #2 to greater than twenty-five tons per year, must be approved by the Office of Air Management (OAM) before such change may occur, is not applicable because the source requested that all material usage rates be included in a single BACT limitation and a limitation to make 326 IAC 8-2-9 not applicable. Therefore, VOC usage rates from each individual facility are not required, and the source is subject to the requirements of 326 IAC 8-1-6.

The Facility Description in the Quarterly Report Form is revised as follows:

Facilities: Three (3) paint ~~and paint repair rooms~~ **booths (Paint Booths Nos. 1 through 3)**, one (1) parts repair spray booth (~~REPBOOTH~~ **Repair Booth No. 4**), and two (2) parts sanding booths (~~SANDBOOTH #1 and SANDBOOTH #2~~ **Sanding Booths Nos. 5 and 6**) (VOC from sanding results from wiping and glazecoating plastic parts)

Comment 4:

Condition C.18(a) General Reporting Requirements - Please change this condition to require Semi-Annual Compliance Monitoring Reporting as follows: "To affirm that this source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report." Also, please change the provided reporting form accordingly.

Response 4:

Pursuant to 326 IAC 2-7-5(3)(C)(i), submittal of reports of any required monitoring should take place at least every six (6) months. Since there are Quarterly Reports required in this permit, IDEM, OAM, requires that the Compliance Monitoring Report be submitted quarterly. This will reduce any confusion in the reporting requirements. There are no changes to the permit as a result of this comment.

Comment 5:

Condition D.1 Facility Operation Conditions - The changes in the descriptive information of Condition A.2 listed in comments 2 & 3 should also be made to the Facility Descriptions in Condition D.1.

Response 5:

These changes have been made as indicated in Responses 2 and 3.

Comment 6:

Condition D.1.1(a) Volatile Organic Compounds - Please change this condition to read as follows: "When coating metal parts if the VOC delivered to the applicators, minus the VOC recovered meets or exceeds 15 pounds per day this facility will be subject to the applicable requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating."

Response 6:

The requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating, can be applicable to this source since the potential to emit VOC meets or exceeds 15 pounds per day. In order to make the requirements of 326 IAC 8-2-9 not applicable, the source has accepted a limit on the potential to emit VOC to less than 15 pounds per day when coating metal parts. The applicability of 326 IAC 8-2-9 cannot vary on a daily basis. There are no changes to the permit as a result of this comment.

Comment 7:

Condition D.1.2 (b) & (c) Volatile Organic Compounds - (b) Please change this condition to read as follows: "The total VOC usage in coatings and cleanup solvents used at the surface coating facilities, minus the VOC recovered, shall be limited to no more than 95 tons per consecutive twelve (12) month period."

(c) The listed work practices: Please change item (1) to read as follows: "Cleanup solvent containers used to transport VOC and/or HAP containing solvent from bulk containers to work stations shall be kept closed." Please remove item (6). The terminology of this Condition (instructed and trained, methods and practices) are undefined and considered arbitrary and capricious.

Response 7:

For clarity, Condition D.1.2(b) has been revised as follows:

(b) The total VOC usage in coatings and cleanup solvents used at the surface coating facilities**, minus the VOC recovered,** shall be limited to no more than 95 tons per consecutive twelve (12) month period.

For clarity, Condition D.1.9(a) has been revised as follows:

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and monthly, as indicated, and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used each month. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC used **(VOC delivered to the applicators minus VOC recovered)** on metal parts each day;

(5) The total VOC usage **(VOC delivered to the applicators minus VOC recovered)**

for each month; and

(6) The weight of VOCs emitted for each compliance period.

The BACT requirement in Condition D.1.2(c)(1) is necessary to ensure compliance with 326 IAC 8-1-6. This wording was proposed by Prodesign Paint, Plant 820 in the BACT analysis submitted on September 30, 1998 and no revision was requested in subsequent discussions. Thus, only the following change has been made to Condition D.1.2(c)(1):

(1) Cleanup solvent containers used to transport solvent from ~~drums~~ **bulk containers** to work stations shall be closed containers having soft gasketed spring-loaded closures.

Comment 8:

Condition D.1.3(b) Particulate Matter - (b) The language listed in this condition should reflect the standard language used in the IDEM Title V Model Permit document. Example: "Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emissions from the two (2) sanding booths shall not exceed the pound per hour emission rate established as E in the following formula: . . . "

Response 8:

Condition D.1.3(b) accurately describes the requirements of 326 IAC 6-3-2. When operating at a process weight rate of 0.72 tons per hour, the PM emissions shall not exceed 3.3 pounds per hour. This condition was also contained in CP-039-10054-00320, issued January 21, 1999. The equation is provided so that the allowable emissions can be calculated at times when the sanding booths are operating at a different process weight rate. There are no changes to the permit in response to this comment.

Comment 9:

Condition D.1.7(b) Particulate Matter - (a) Please change this condition to read as follows: "The dry filters for PM control shall be in operation at all times when the paint booths Nos. 1-3 and the parts repair spray booth No. 4 are in operation." (b) Please change this condition to read as follows: "The dry filters shall be in operation at all times when and the parts sanding booths Nos. 5 and 6 are in operation."

Response 9:

These changes have been made as indicated in Responses 2 and 3.

Comment 10:

Condition D.1.10 Reporting Requirements - Please change this condition to require semi-annual summary reporting. Also, please change the provided reporting form accordingly.

Response 10:

This change will not be made to the permit. Please see Response 4.

Upon further review, the OAM has decided to make a change to the Part 70 Operating Permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

An error in Condition B.16(a) has been corrected as follows:

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation, ~~within ten (10) calendar days from the date of the discovery of the deviation,~~ except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Prodesign Paint, Plant 820**
Source Location:	**910 Summa Drive, Elkhart, Indiana 46516**
County:	**Elkhart**
SIC Code:	**3711**
Operation Permit No.:	**T 039-7510-00320**
Permit Reviewer:	**CarrieAnn Ortolani**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Prodesign Paint, Plant 820, formerly Viking Custom Paint, Plant 820 of Viking Formed Products, relating to the operation of a van and motor home parts custom painting source.

Source Definition

This custom motor home and van and motor home parts coating company consists of two (2) plants:

(a) Plant 810 is located at 104 Rush Court, Elkhart, Indiana 46514; and

(b) Plant 820 is located at 910 Summa Drive, Elkhart, Indiana 46514.

The two (2) plants are located within approximately one (1) mile of each other, have the same four (4) digit SIC codes and are owned by one (1) company. However, they will be considered two (2) separate sources because there is little (less than five percent (5%)) support relationship between Plants 810 and 820. Therefore, separate Part 70 permits will be issued for Plant 810 and Plant 820.

Permitted Emission Units and Pollution Control Equipment

The source has a capacity of 2.5 kits containing multiple parts per hour and consists of the following permitted emission units and pollution control devices:

(a) The following surface coating facilities with a total capacity of 2.5 kits of metal and/or plastic vehicle parts per hour:

(1) Three (3) paint and paint repair rooms for coating fiberglass, plastic, and metal van and motor home parts, constructed in 1983, with all rooms equipped with high volume, low pressure (HVLP) and air assisted airless spray guns, with dry filters as overspray control and exhausting to stacks V1 through V6.

(2) One (1) parts repair spray booth, identified as REPBOOTH, constructed in 1998, with overspray emissions controlled by an exhaust filter system, with all emissions exhausted to Stack V8.

(b) Two (2) parts sanding booths, identified as SANDBOOTH #1 and SANDBOOTH #2, constructed in 1998, for sanding and surface cleaning parts, with particulate emissions controlled

by cloth filters, and exhausting to Stacks V9 and V10, respectively, capacity: 75 parts per hour, each, and 0.72 tons per hour, each.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour.

(b) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual through-puts less than 12,000 gallons.

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(c) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F); or

(2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(d) Closed loop heating and cooling systems.

(e) Any operation using aqueous solutions containing less than one percent (1%) by weight of VOC excluding HAPs.

(e) Paved and unpaved roads and parking lots with public access.

(f) On-site fire and emergency response training approved by the department.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Registration for Plant 2 (no number) issued January 4, 1985, and

(b) CP-039-10054-00320, issued January 21, 1999.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) Registration for Plant 2 (no number) issued January 4, 1985

No Condition Number: No construction or operation permit is required. There are no limits in 325 IAC 6-3 or 8-2 that are applicable to this operation. This registration is issued with the condition that operation of the spray paint booths shall be limited to 4,500 hours per year in order to limit volatile organic compound (VOC) emissions to less than 25 tons per year. Perfection Painting shall record hours of operation and retain these records for a period of not less than two years in order to confirm that this condition has been met. These records shall be made available to the air pollution inspector upon request.

Reason not incorporated: Since this source is located in Elkhart County and the three (3) paint rooms covered in this permit were in existence as of July 1, 1990, a limitation of less than 25 tons per year will not make the requirements of 326 IAC 8-2 not applicable. The requirements of 326 IAC 8-2-9 are applicable to facilities existing in Elkhart County as of July 1, 1990 with VOC emissions of 15 pounds per day or more. Since the facilities will not be limited to less than 25 tons per year of VOC in this permit, the requirements of 326 IAC 8-1-6 are applicable. Since potential VOC emissions are greater than 100 tons per year, the source has applied for a Part 70 Operating Permit. The source was owned by Perfection Painting in the registration issued in 1985. Ownership of the source has changed twice since the registration was issued.

(b) CP-039-10054-00320, issued January 21, 1999, Operation Condition 12:

Volatile Organic Compound
That pursuant to 326 IAC 2-1-3(i)(8):

(a) records of surface coating quantities and organic solvent contents from REPBOOTH, SANDBOOTH #1, and SANDBOOTH #2 shall be maintained, and

(b) records of surface coating quantities and organic solvent contents from REPBOOTH shall be maintained demonstrating that the total daily VOC emissions from the coating of metal parts in spray booth REPBOOTH do not exceed 15 pounds per day.

The records under this condition shall be maintained for a minimum period of 36 months and made available upon request of the Office of Air Management (OAM).

Any change or modification which may increase the actual VOC emissions from the coating of metal parts in spray booth REPBOOTH to greater than fifteen (15) pounds per day, increase the potential VOC emissions from the coating of plastic parts in spray booth REPBOOTH to greater than 25 tons per year, or increase the potential VOC emissions from either sanding booth SANDBOOTH #1 or sanding booth SANDBOOTH #2 to greater than twenty-five tons per year, must be approved by the Office of Air Management (OAM) before such change may occur.

Reason not incorporated: The source will be required to keep VOC records for all surface coating and sanding. To facilitate record keeping, the source requested that all material usage rates be included in a single BACT limitation and a limitation to make 326 IAC 8-2-9 not applicable. Therefore, VOC usage rates from each individual facility are not required, and the source is subject to the requirements of 326 IAC 8-1-6.

(c) CP-039-10054-00320, issued January 21, 1999, Operation Condition 10(a):
That pursuant to 326 IAC 6-3 (Process Operations), the cloth filters for SANDBOOTH #1 and SANDBOOTH #2 shall be in operation at all times when the booths are in operation,

and shall not exceed the combined allowable particulate matter (PM) emission rate of 3.3 pounds per hour.

Reason not incorporated: The allowable PM emission rate of 3.3 pounds per hour should be per facility when operating at a process weight rate of 0.72 tons per hour, each. The allowable emission rate can fluctuate as the process weight rate fluctuates. The source has determined that each booth may operate at a process weight rate of 0.72 tons per hour.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 12, 1996. Additional information was received on October 10, 1997, and October 22, 1997 via telephone. The source updated and resubmitted an application on September 2, 1998. Additional information was received on March 25, 1999, February 8, 2000, and March 23, 2000.

A notice of completeness letter was mailed to the source on January 8, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 3 of 3).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	**Potential To Emit** (tons/year)
PM	33.2
PM_{10}	33.2
SO_2	2.00
VOC	164
CO	5.00
NO_X	2.00

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the

regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
MEK	9.95
MIBK	5.60
Glycol Ethers	5.62
Styrene	0.013
TOTAL	21.2

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data. No previous HAP emission data has been received from the source. Therefore, the HAP emissions were assumed to be less than the VOC emissions since all HAPs at this source are VOC, except some HAPs from insignificant combustion.

Pollutant	Actual Emissions (tons/year)
PM	0.130
PM_{10}	0.130
SO_2	0.00
VOC	15.4
CO	0.00
NO_X	0.00
HAP (specify)	< 15.4

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
Surface coating facilities and two (2) parts sanding booths	3.51	3.51	0.00	95.0	0.00	0.00	12.7
Insignificant Activities	5.00	5.00	2.00	5.00	5.00	2.00	1.00
Total Emissions	8.51	8.51	2.00	100	5.00	2.00	13.7

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326

IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Although the source is not a major source of hazardous air pollutants (HAPs), the source is a custom coating source and it is feasible that HAP emissions can increase. Since the surface coating commenced construction prior to July 27, 1997, the requirements of 326 IAC 2-4.1-1 are not applicable. Pursuant to CP-039-10054-00320, issued on January 21, 1999, the one (1) parts repair spray booth constructed after July 27, 1997 has a potential to emit less than 10 tons per year of each individual HAP and less than 25 tons per year of total HAPs and the sanding operations have a potential to emit less than 10 tons per year of each individual HAP and less than 25 tons per year of total HAPs. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable to this source.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from each of the three (3) paint and paint repair rooms, constructed in 1983, and the particulate matter (PM) from the one (1) parts repair spray booth, identified as REPBOOTH, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the three (3) paint and paint repair rooms and the one (1) parts repair spray booth are in operation, in order to comply with this limit.

326 IAC 6-3-2 (Process Operations)

The allowable PM emission rate from the two (2) parts sanding booths, identified as SANDBOOTH #1 and SANDBOOTH #2, shall not exceed 3.3 pounds per hour, each, when operating at a process weight rate of 0.72 tons per hour, each. Since the process weight rate is often lower than 0.72 tons per hour and, thus, the allowable is lower than 3.3 pounds per hour, the cloth filters for SANDBOOTH #1 and SANDBOOTH #2 shall be in operation at all times when the booths are in operation. This limitation was computed using the following equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Since all surface coating facilities at this source may coat metal parts, the facilities can be subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating). Since three (3) paint and paint repair rooms were in existence on July 1, 1990 in Elkhart County and the one (1) parts repair spray booth was constructed after July 1, 1990 in Elkhart County, the VOC delivered to the applicators, minus the VOC recovered when coating metal parts shall be limited to less than 15 pounds per day. This will limit VOC emissions from coating metal parts to less than 15 pounds per day and make the requirements of 326 IAC 8-2-9 not applicable pursuant to 326 IAC 8-2-1(c), 326 IAC 8-2-1(d).

326 IAC 8-1-6 (New Facilities; General reduction requirements)

This source has a potential to emit 25 tons per year or more of VOC and all facilities were constructed after January 1, 1980. Since there are no other 326 IAC 8 rules applicable to coating and sanding plastic parts (VOC from sanding results from wiping and glazecoating plastic parts), the requirements of 326 IAC 8-1-6 are applicable, and the source must install the best available control technology (BACT). The potential to emit VOC from the one (1) parts repair spray booth is less than 25 tons per year and the potential to emit VOC from each of the two (2) sanding booths is less than 25 tons per year. However, because these facilities can operate in series with the previously existing facilities and to facilitate record keeping, the applicant requested that the BACT be for all surface coating and sanding operations currently existing at this source.

The following control options were evaluated in a BACT analysis:

(a) Condensation- Condensation systems are only effective for gas streams containing high concentrations of high molecular weight VOCs. The exhaust streams at this source contain low concentrations of relatively low molecular weight VOCs. Therefore, condensation is not technologically feasible.

(b) Carbon Adsorption- The presence of ketones (MEK, MIBK) or any other VOCs containing a carbonyl group can result in exothermic reactions which could lead to carbon bed fires. Also, given the wide variety of carrier solvents utilized at the plant, it is not practicable to recover the solvents for reuse. Therefore, the only technologically feasible control option using carbon adsorption is destroy the VOC with a thermal oxidizer after carbon adsorption and reduce the use of ketones at the plant.

(c) Liquid Absorption- In order for liquid absorption to be effective, the VOCs must be soluble in the same liquid, typically water. Since this source is a custom coating source, the coatings may often contain VOCs, such as toluene and xylene, which are not soluble in water. Therefore, liquid absorption is not technologically feasible.

(d) Flares (Oxidation) - Flares are used when the concentration of VOCs in the exhaust is at or above the lower flammability level. Since the expected exhaust stream VOC concentrations at this source will be very low (roughly 30 ppmv), flares are not technologically feasible.

(e) Catalytic Oxidation - In order for a catalyst to be effective, the active sites upon which the VOCs react must be accessible, and the catalyst must be active. The build up of non-combustible particles, polymerized materials, or reaction of the catalyst with certain elements can either mask or poison the catalyst, making it unavailable for initiating oxidation reactions. The variability of pigments utilized by this source create a strong likelihood that compounds may be used which render the catalytic oxidizer ineffective.

(f) Thermal Oxidation - Recuperative and regenerative thermal oxidizers are technologically feasible control options for this source.

The add-on control options evaluated in a cost analysis are Recuperative Thermal Oxidation, Regenerative Thermal Oxidation, and Carbon Adsorption with Thermal Oxidation. The cost of control was evaluated using one device for the entire source. The cost of installation and duct work for total enclosure was not included in the BACT analysis. Utilization of a single centrally-located control device is not preferred since preventive maintenance requirements or an equipment malfunction requires the entire plant to shut down. Multiple control devices, however, will increase the cost of control. Therefore, the computed cost of controlling VOC emissions is an underestimation of the actual costs of control.

The cost of add-on control methods, as determined by the cost analysis, ranged between $3,980 per ton of VOC removed and $11,713 per ton of VOC removed. The least expensive was adding a Carbon Adsorption with an oxidizer ($3,980 per ton). The applicant has indicated that these add-on control methods are economically not feasible for this source. The applicant will accept a VOC emission limit of 95 tons per year as BACT.

Additional control methods considered by the source are as follows:

Transfer Efficiency - High volume, low pressure (HVLP) spray equipment or a spray applicator as efficient or more efficiency than HVLP may be used to apply coatings at these facilities.

High solids coating systems - This source is a custom coating source. The materials used change regularly to meet customer quality, performance and price objectives. Although emissions summarized in Appendix A represent the worst case expected VOC emissions, the VOC content of coatings must vary to meet customer demand. Therefore, the source may use coatings that contain the lowest VOC possible, while meeting customer objectives, but cannot take a limit on VOC content of coatings.

South Coast Air Quality Management District (SCAQMD) Rule 1145 for plastic coating - Upon the request of IDEM, OAM, the source considered compliance with Rule 1145 as a possible BACT. Rule 1145 requires that the volatile organic compound (VOC) content of coating (excluding clearcoat) delivered to the applicators at the paint booths when coating plastic parts be limited to 3.5 pounds of VOCs per gallon of coating less water. This source is a custom coating source. The materials used change regularly to meet customer quality, performance and price objectives. Although emissions summarized in Appendix A represent the worst case expected VOC emissions, the VOC content of coatings must vary to meet customer demand. Therefore, the source may use coatings that contain the lowest VOC possible, while meeting customer objectives, but cannot take a limit on VOC content of coatings.

Therefore, BACT for this facility has been determined to be as follows:

(a) All coatings will be applied using high volume, low pressure (HVLP) spray equipment or a spray applicator as efficient or more efficient than a HVLP spray applicator.

(b) The total VOC usage in coatings and cleanup solvents used at the surface coating facilities shall be limited to no more than 95 tons per consecutive twelve (12) month period.

(c) The listed work practices as follows:

(1) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(2) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(3) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(4) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized.

(5) Storage containers used to store VOC and/or HAP containing materials shall be kept covered when not in use.

(6) The application equipment operators shall be instructed and trained in the methods and practices utilized to minimize overspray.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The surface coating and sanding have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks V1 through V6 and V8 while one or more of the facilities are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the cloth filters for sanding and dry filters for surface coating must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations (page 2 of 3).

Conclusion

The operation of this van and motor home parts custom painting source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 039-7510-00320.**

BACT Cost Analysis

Facility Name: Prodesign Paint, Plant 820

Location: Elkhart, Indiana

Permit No.: T 039-7510-00320

Permit Reviewer: CAO/MES

Capital Cost

Option	Base Price	Direct Cost	Indirect Cost	Total
Recuperative Thermal Oxidizer	843,027	Not included in analysis	Included in the direct cost	843,027
Carbon Adsorption with Oxidizer	1,332,177	Not included in analysis	Included in the direct cost	1,332,177
Regenerative Thermal Oxidizer	2,029,452	Not included in analysis	Included in the direct cost	2,029,452
VOC emission limit	N/A	N/A	N/A	N/A
No controls	N/A	N/A	N/A	N/A

Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Recuperative Thermal Oxidizer	1,524,041	51,858	99,022	1,674,921
Carbon Adsorption with Oxidizer	344,409	65,855	158,944	569,208
Regenerative Thermal Oxidizer	365,184	88,535	238,379	692,098
VOC emission limit	N/A	N/A	N/A	0
No controls	N/A	N/A	N/A	0

Evaluation

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	$/ton removed
Recuperative Thermal Oxidizer	159	143	90.0	11,713
Carbon Adsorption with Oxidizer	159	143	90.0	3,980
Regenerative Thermal Oxidizer	159	143	90.0	4,840
VOC emission limit	159	64	N/A	0
No controls	159	0	N/A	0

Methodology:

Emissions removed = (potential emissions)*(control efficiency)
$/ton removed = total annual cost/emissions removed

The cost breakdown is as follows:

1. Capital Cost

a) Base price: purchase price, auxiliary equipment, instruments, controls, taxes and freight.

b) Direct installation cost: foundations/supports, erection/handling, electrical, piping, insulation, painting, site preparation and building/facility.

c) Indirect installation cost: engineering, supervision, construction/filed expenses, construction fee, start up, performance test, model study and contingencies.

2. Annual Cost

a) Direct operating cost: operating labor (operator, supervisor), labor and material maintenance, operating materials, utilities (electricity, gas).

b) Indirect operating cost: overhead, property tax, insurance, administration and capital recovery cost (for 20 yrs life of the system at 10% interest rate).

Company Name: **Prodesign Paint, Plant 820**
Address City IN Zip: **910 Summa Drive, Elkhart, Indiana 46514**
Part 70 OP: **T 039-7510**
Plt ID: **039-00320**
Reviewer: **CarrieAnn Ortolani**
Date: **December 12, 1996**

Cost of Duct Work per Linear Foot *	0
Operating and Supervising Labor Cost/ hr	16.48
Maintenance Labor Cost/ hr	18.13
Electric Cost / kwh	0.06
Natural Gas Cost/ mscf	4.00

* The cost of duct work is not computed in this analysis

Recuperative Thermal Oxidizer

Capital Costs

Capital Cost ($)	Installation ($)	Duct Work ($)	Total ($)
843027	0	0	843027

Direct Annual Costs

Fuel Use scfm	Fuel Use CuFT/yr	Fuel Cost ($)	Gas Flow Rate (scfm)	Pressure Drop	Electricity Cost ($)
663.6	3.5E+08	1395153	50664	19	98660

Operating Labor Hrs	Supervisor Labor Hrs	Labor Cost ($)	Maintenance Labor Hrs	Maintenance Labor Cost ($)	Maintenance Cost ($)
547.5	82.125	10376	547.5	9926	9926

Indirect Annual Costs

Interest Rate	Life of Unit (years)	Capital Recovery Factor	Capital Recovery ($)
10.00%	20	0.11746	99022

Other Indirect* ($)	Overhead** ($)	Total Misc. Indirect ($)
33721	18137	51858

Carbon Adsorption with oxidizer

Capital Costs

Carbon ($)	Capital Cost ($)	Installation ($)	Duct Work ($)	Total ($)
16852	1315325	0	0	1332177

Direct Annual Costs

Fuel Use scfm	Fuel Use CuFT/yr	Fuel Cost ($)	Gas Flow Rate (scfm)	Pressure Drop	Electricity Cost ($)
128.5	67539600	270158	10129	19	19725

Steam Cost ($/1000 lbs)	Steam Usage (lbs)	Steam Cost ($)	Cooling Water Cost ($/1000 gal)	Cooling Water Usage (gal)	Cooling Water Cost ($/1000 gal)
6	665000	3990	0.20	2280000	456

Operating Labor Hrs	Supervisor Labor Hrs	Labor Cost ($)	Maintenance Labor Hrs	Maintenance Labor Cost ($)	Maintenance Cost ($)
547.5	82.125	10376	1095	19852	19852

Indirect Annual Costs

Interest Rate	Life of Unit	Capital Recovery Factor	Capital Recovery ($)	Carbon Capital Recovery ($)
10.00%	20	0.11746	154498	4446

Other Indirect* ($)	Overhead** ($)	Total Misc. Indirect ($)
53287	12568	65855

Regenerative Thermal Oxidizer

Capital Costs

Capital Cost ($)	Installation ($)	Duct Work ($)	Total ($)
2029452	0	0	2029452

Direct Annual Costs

Fuel Use scfm	Fuel Use CuFT/yr	Fuel Cost ($)	Gas Flow Rate (scfm)	Pressure Drop	Electricity Cost ($)
119	62546400	250186	50119	20	102736

Operating Labor Hrs	Supervisor Labor Hrs	Labor Cost ($)	Maintenance Labor Hrs	Maintenance Labor Cost ($)	Maintenance Cost ($)
547.5	82.125	10376	52	943	943

Indirect Annual Costs

Interest Rate	Life of Unit (years)	Capital Recovery Factor	Capital Recovery ($)
10.00%	20	0.11746	238379

Other Indirect* ($)	Overhead** ($)	Total Misc. Indirect ($)
81178	7357	88535

* Other indirect costs include property taxes, insurance and administrative charges. This is 4% of the total capital investment.
** Overhead is calculated as 60% of all labor costs

Appendix A: Federal Potential Emissions Calculations
Particulate Emissions
From Sanding

Company Name: **Prodesign Paint, Plant 820**
Address City IN Zip: **910 Summa Drive, Elkhart, Indiana 46514**
Part 70 OP: **T 039-7510**
Plt ID: **039-00320**
Reviewer: **CarrieAnn Ortolani**
Date: **December 12, 1996**

The following calculations determine the PM/PM10 PTE based on emissions controlled by cloth filters with a design outlet grain loading of 0.027 gr/dscf, an air flow rate of 1,500 dscfm, 85% efficiency, and 8,760 hours of operation:

Emission Unit	Stack	Flow Rate (acfm)	Outlet Grain Loading (gr/acfm)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	ntrol Efficier	Potential Emissions (lbs/hr)	Potential Emissions (tons/yr)	Process Weight Rate (lbs/hr)	Allowable Emissions (lbs/hr)
Parts Sand Booth #1	V9	1500	2.70E-02	0.347	1.52	85.0%	2.31	10.1	1440	3.3
Parts Sand Booth #2	V10	1500	2.70E-02	0.347	1.52	85.0%	2.31	10.1	1440	3.3
				0.694	3.04		4.63	20.3		

Methodology

Controlled Emissions (lbs/hr) = gr/acfm x acfm x 60 minutes/hr / 7000 gr/lb
Uncontrolled Emissions (lbs/hr) = Controlled Emissions (lbs/hr) / (1 - Control Efficiency)
Emissions (tons/yr) = Emissions (lbs/hr) * 8760 hrs/yr / 2000 lbs/ton
Allowable Emissions (lbs/hr) = 4.10 x (Process weight (lbs/hr) / 2000 lbs/ton)^0.67 [326 IAC 6-3-2]

Appendix A: Federal Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Prodesign Paint, Plant 820
Address City IN Zip: 910 Summa Drive, Elkhart, Indiana 46514
Part 70 OP: T 039-7510
Plt ID: 039-00320
Reviewer: CarrieAnn Ortolani
Date: December 12, 1996

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
Three (3) paint and paint repair rooms and one (1) parts repair spray booth																	
Basecoat	9.15	100.00%	0.0%	100.0%	0.0%	0.00%	0.72000	2.500	1.000	9.15	9.15	16.47	395.28	72.14	0.00	N/A	75%
Clearcoat	7.89	49.30%	0.0%	49.3%	0.0%	0.00%	0.72000	2.500	1.000	3.89	3.89	7.00	168.04	30.67	7.88	N/A	75%
Diluent and Cleaning solvent	7.33	100.00%	0.0%	100.0%	0.0%	0.00%	0.35000	2.500	1.000	7.33	7.33	6.41	153.93	28.09	0.00	N/A	75%
Two (2) parts sanding booths																	
Solvent Wipe	6.33	100.00%	0.0%	100.0%	0.0%	0.00%	0.50000	2.000	1.000	6.33	6.33	6.33	151.92	27.73	0.00	N/A	75%
Glazecoat	15.0	25.00%	0.0%	25.0%	0.0%	75.00%	0.00040	2.000	1.000	3.75	3.75	0.00	0.07	0.01	0.01	5.00	75%
State Potential Emissions			**Add worst case coating to all solvents**									**36.2**	**869**	**159**	**7.89**		

Control Technology Emissions (Combustion)																
						Emission Factors							Emissions			
Type	Number	Capacity	Gas usage	PM	PM10	SO2	NOx	VOC	CO		PM	PM10	SO2	NOx	VOC	CO
		MMBtu/hr	MMCF/yr	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF		tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
Catalytic			0.0	3.0	3.0	0.6	100.0	5.3	35.0		0.0	0.0	0.0	0.0	0.0	0.0
Thermal			0.0	3.0	3.0	0.6	140.0	2.8	20.0		0.0	0.0	0.0	0.0	0.0	0.0
Total			0.0								0.0	0.0	0.0	0.0	0.0	0.0
										Control Efficiency		Controlled	Controlled	Controlled	Controlled	
										VOC	PM	VOC pounds	VOC pounds	VOC	Particulate	
									Coating:	0.00	0.90	per hour	per day	tons/yr	tons/yr	
									Sanding:	0.00	0.85					
Controlled Emissions due to Surface Coating Operations and Controls											**Total:**	**36.2**	**869**	**159**	**0.790**	

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Flash-off
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Flash-off
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Flash-off
Total = Worst Coating + Sum of all solvents used

HAP Emission Calculations

Company Name: **Prodesign Paint, Plant 820**
Address City IN Zip: **910 Summa Drive, Elkhart, Indiana 46514**
Part 70 OP: **T 039-7510**
Plt ID: **039-00320**
Reviewer: **CarrieAnn Ortolani**
Date: **December 12, 1996**

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % MIBK	Weight % Glycol Ethers	Weight % Styrene	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Styrene Emissions (tons/yr)	**Total HAP Emissions**
Three (3) paint and paint repair rooms and one (1) parts repair spray booth												
Basecoat	9.15	0.72000	2.500	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.000	0.00
Clearcoat	7.89	0.72000	2.500	16.00%	9.00%	0.00%	0.00%	9.95	5.60	0.00	0.000	15.55
Diluent and Cleaning solvent	7.33	0.35000	2.500	0.00%	0.00%	20.00%	0.00%	0.00	0.00	5.62	0.000	5.62
Two (2) parts sanding booths												
Solvent Wipe	6.33	0.50000	2.000	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.000	0.00
Glazecoat	15.0	0.00040	2.000	0.00%	0.00%	0.00%	25.00%	0.00	0.00	0.00	0.013	0.01

Total State Potential Emissions

TOTALS:	**(tons/yr):**	**9.95**	**5.60**	**5.62**	**0.013**	**21.2**
	(lb/hr):	**2.27**	**1.28**	**1.28**	**0.003**	**4.84**
	(g/sec):	**0.287**	**0.161**	**0.162**	**0.0004**	**0.610**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs